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Mansfield District Council
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SENT BY E-MAIL AND POST

10th November 2017

Dear Sir / Madam

MANSFIELD LOCAL PLAN PREFERRED OPTIONS CONSULTATION

Introduction

Thank you for consulting with the Home Builders Federation (HBF) on the above mentioned consultation. The HBF is the principal representative body of the house-building industry in England and Wales. Our representations reflect the views of our membership, which includes multi-national PLC's, regional developers and small, local builders. In any one year, our members account for over 80% of all new "for sale" market housing built in England and Wales as well as a large proportion of newly built affordable housing. We would like to submit the following comments in response to specific questions in the Council's consultation document.

QUESTION 1: Do you support the proposed vision for the district up until 2033?

QUESTION 2: Should any changes be made? If so, please identify what changes should be made.

The HBF question if the proposed spatial strategy of only 10% of future development outside the Mansfield Urban Area will achieve the Council's stated Vision that "*Market Warsop will have strengthened its role as the main town for Warsop Parish ... The rural villages will remain attractive places to live*". It is important that the Council's proposed housing distribution recognises the difficulties facing rural communities in particular housing supply and affordability issues. The National Planning Practice Guidance (NPPG) emphasises that all settlements can play a role in delivering sustainable development so blanket policies restricting housing development in some settlements and preventing other settlements from expanding should be avoided. One of the core planning principles of the National Planning Policy Framework (NPPF) is to "*take account of the different roles and character of different areas ... recognising the intrinsic character and beauty of the*

countryside and supporting thriving rural communities within it” (para 17) and “to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities” (para 55). The Council’s proposed distribution of housing should meet the housing needs of both urban and rural communities in order to achieve its Vision.

QUESTION 3: Do you agree that the identified strategic objectives are appropriate for the district?

QUESTION 4: Should any changes be made? If so, please identify what changes should be made.

It is the HBF’s opinion that **Objective 1** is inappropriate. This objective states “... *to support ... the regeneration of previously developed land ...In doing so, prioritise development within the Mansfield urban area, followed by Market Warsop, whilst seeking to minimise the loss of greenfield land*”. This is inconsistent with national policy as set out in the NPPF (para 111). A brownfield first policy approach should not be applied. The Council should be encouraging the re-use of previously developed land (PDL) by maximising its re-use but there should be no prioritising of brownfield first. If the Council wishes to regenerate the Mansfield Urban Area it should be done by maximising the re-use of PDL.

The Council’s fifth strategic priority states “*Let’s plug the demographic gaps – making Mansfield district an attractive place for all age groups to live*” and **Objective 3** continues “*to increase the range and choice of housing throughout the urban areas and villages, that meets the needs of the whole community, including the need for affordable housing, low cost and specialist housing to meet the needs of the ageing population and to attract young people to the District*”. The HBF question if the objectively assessed housing need (OAHN) of 376 dwellings per annum for the District sub-divided into 340 dwellings per annum in the Mansfield Urban Area (including Clipstone, Rainsworth & Pleasley) and 36 dwellings per annum in Warsop & Villages (including Medon, Market Warsop, Medan Vale & Spion Kop) as set out in the latest SHMA Report will achieve the Council’s fifth Strategic Priority and **Objective 3** (also see answer to **Question 5** below). If the Council under-estimates its OAHN then the housing needs for the whole community including younger and older age groups and affordable housing needs will not be met. The HBF have particular concerns about the minimal adjustments in the OAHN calculation for worsening market signals and a suppression of affordable housing need based on a high affordability threshold. The proposed distribution of housing will also impact on the range and choice of housing especially in the rural area outside the Mansfield Urban Area (see answer to **Questions 1 & 2** above).

The Council should not apply restrictive policies in seeking to meet the housing needs of the whole community. The HBF recognise that all households should have access to different types of dwellings to meet their housing needs. Therefore planning for a mix of housing needs should focus on ensuring that there are appropriate sites allocated to meet the needs of specifically identified groups of households such as the elderly without seeking a specific housing mix on individual sites. Indeed the housing needs of older people is a diverse sector so the Local Plan should be ensuring that suitable sites are

available for a wide range of developments across a wide choice of appropriate locations. The HBF also suggests that the identified need for 437 C2 bed spaces should be separately set out in the Plan.

QUESTION 5: Do you agree with the amount of housing development we propose to make provision for? If not what changes do you suggest?

As set out in the HBF representations to the Council's previous Local Plan consultation ended on 22nd February 2016 there are concerns that the Council's OAHN under-estimates housing needs therefore the proposed amount of housing development is too low. The OAHN calculation for the Outer Nottingham Housing Market Area (HMA) comprising of Mansfield, Ashfield and Newark & Sherwood District Councils is set out in the 2015 SHMA Report. For Mansfield the calculation is set out as follows :-

- Starting point - 2012 SNPP & 2012 SNHP household formation rates (HFR) identified household growth of 252 per annum converted into 263 dwellings per annum by applying 4.4% vacancy & second home allowance ;
- Sensitivity testing - 12 year migration trends and inclusion of UPC assumptions resulted in an increase to 356 dwellings per annum ;
- Jobs led modelling - resulted in no further adjustment ;
- An analysis of market signals - resulted in an uplift to 376 dwellings per annum equal to 7,520 dwellings for the plan period 2013 – 2033 ;
- A separate assessment of affordable housing needs calculated 64 affordable homes per annum which meant no further adjustment to the "policy on" housing requirement.

However the HBF is critical of the Council's approach to no or minimal upward adjustments for economic growth, market signals and affordable housing needs. In summary :-

- jobs led modelling - comprised of only one economic forecast which is now somewhat dated, the use of alternative employment rates would have produced different results in this context the employment rates used for both male and female groups aged over 50 are very optimistic and the Council acknowledges that action should be taken to sustain the local economy because of reductions in the future labour force ;
- market signals - worsening trends in more than one market signal indicator (overcrowding, houses in multiple occupation and house price / earnings ratio) identified yet only a modest uplift equivalent to 20 dwellings per annum (5%) applied to improve affordability for younger age groups ;
- affordable housing need - 64 affordable homes per annum based 30% affordability threshold scenario which is significantly below the 25% affordability threshold scenario of 180 affordable homes per annum. The selection of 30% should be fully justified so the Council is not seen to be under-estimating its affordable housing needs especially given that Mansfield has the second highest record of homelessness in the country. An affordable housing need of 180 affordable homes per

annum (48% of OAHN) would warrant re-consideration of whether or not housing supply should be increased to deliver more affordable houses (NPPG ID 2a-029).

It is noted that the Council concluded that there are no significant changes to its OAHN from the publication of 2014 SNPP & SNHP. However in the Housing White Paper the Government is critical of Council's who are not undertaking an honest assessment of housing needs. The Government is currently consulting on a standardised methodology for the calculation of OAHN. By the time of the Mansfield Local Plan Examination (if submitted after March 2018) it may be necessary for the Council to prepare an assessment of housing needs based on this standard methodology.

QUESTION 6: Do you have any comments on the housing technical paper?

See answer to **Question 5** above.

QUESTION 7: Do you agree with the distribution of growth (the split between Mansfield urban area and Warsop Parish) within the district?

QUESTION 8: If you do not agree with the distribution of development proposed, please indicate how and why future development should be distributed and provide information to support this.

The HBF have concerns about the proposed distribution of growth split 90% in Mansfield Urban Area (including Clipstone, Rainsworth & Pleasley) and 10% in Warsop & Villages (including Medon, Market Warsop, Medan Vale & Spion Kop) which reflects the existing settlement pattern whereby 11.5% of the population live in Warsop Parish (also see answer to **Questions 1 & 2** above). In considering these concerns it is noted that the four options for alternative distributions were very limited and similar in scope so for example the option of distributing 85% in the Mansfield Urban Area and 15% elsewhere was not considered.

The HBF would not wish to comment on specific sites in the preferred options consultation. The Councils approach of allocating a variety of sites is supported because to maximize housing supply the widest possible range of sites, by size and market location are required so that house builders of all types and sizes have access to suitable land in order to offer the widest possible range of products. The key to increased housing supply is the number of sales outlets. Whilst some Sustainable Urban Extensions (SUEs) may have multiple outlets, in general increasing the number of sales outlets available means increasing the number of housing sites. For any given time period overall sales and build out rates are faster from a large number of smaller sites than one SUE. The maximum delivery is achieved not just because there are more sales outlets but because the widest possible range of products and locations are available to meet the widest possible range of demand. This approach is also advocated in the Housing White Paper because a good mix of sites provides choice for consumers, allows places to grow in sustainable ways and creates opportunities to diversify the construction sector. However it is noted that only six sites for 595 dwellings are proposed in Warsop Parish of which 87% are on three sites. As a

consequence this provides far less variety of sites in the rural area compared to the Mansfield Urban Area.

QUESTION 9: Do you agree that sites within the existing settlement boundaries should be allocated before other sites are considered?

QUESTION 10: If not, please let us know what alternative approach should be taken.

There are risks associated with an over reliance on PDL within the urban area. The desire to regenerate brownfield land should be balanced with meeting development needs. The remaining brownfield capacity does not necessarily exist in the locations with highest housing needs and encouraging housing redevelopment should not erode the existing supply of employment sites. It should be acknowledged that the availability of PDL will decline over time as it is a finite resource. The artificial constraint of housing on green-field sites will not ensure delivery of unviable brownfield sites.

QUESTION 11: Have we assessed the sites outside the urban area against the relevant criteria to meet the needs of the vision and objectives?

The HBF would not wish to comment on the merits or otherwise of individual sites assessed outside the urban area against the Council's 5 criteria. The HBF always advocates as large a contingency as possible in the overall Housing Land Supply (HLS) to ensure housing needs are met and that assumptions on lapse rates / non implementation allowance, lead in times and delivery rates are realistic both supported by parties responsible for delivery of housing sites and sense checked by the Council using historical empirical data and local knowledge.

QUESTION 13: Please provide any comments you wish to make on the site selection paper?

With reference to the Site Selection Paper the HBF is supportive of the Council's proposed approach to windfall sites. However the Council should clarify if the average lapse rate of 14% has been applied to the overall HLS and / or 5 YHLS.

Conclusion

It is hoped that these representations are of assistance to the Council in preparing the next stages of the Mansfield Local Plan which to be found sound under the four tests of soundness as defined by the NPPF (para 182) should be positively prepared, justified, effective and consistent with national policy. In the meantime if any further information or assistance is required please contact the undersigned.

Yours faithfully
for and on behalf of **HBF**



Susan E Green MRTPI
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